

Joint State/EPA Region 5 CWA Enforcement & Permitting Work Plan, FY 2012						
State: Indiana			Date/Version: October 13, 2011 (Final)			
Approach				Roles & Responsibilities		
Selected Priorities	Desired Outcome	Targeting Used	Action	Lead	Assisting	Workshare
Topic	What you want to achieve	List any tools used, if applicable	List the one or more actions to be taken to help accomplish the outcome(s).	For each action, identify the responsible party(s), and whether or not workshare is proposed.		
1) Surface Mining	Ensure compliance with the CWA at surface mines of concern	Ambient Water Quality Data, Environmental Justice communities (if applicable) Water Quality Impairments via 303(d), 305(b) reports	Inspections of Surface Mines (EPA will notify IDNR prior to inspections)	Federal	N/A	No
2) Address Significant Noncompliance (SNC) by facilities	Facilities with the worst compliance records are identified, and compliance and enforcement tools are employed to address them	ICIS NPDES Compliance data	Resolve issues with SIC codes in ICIS, prior to the start of the next SRF review	Federal (including Headquarters)	State	Yes
			Continue Bimonthly IDEM/EPA SNC Conference Calls on Major facilities	State	Federal	No
			Follow up on non-compliance by Minor Municipalities, Industries, Pretreatment Permits (Minors) and General Permits (Majors) on bimonthly SNC conference call	State	Federal	No
3) Focus on Mixed Ownership (Semi-Publics) and State-Owned facilities.	Identify and address minor facilities with the worst compliance records	Compliance data	Compliance Through "Assistance First" Initiative - provide "hands-on" operator assistance to 12-15 facilities annually	State	Not Applicable	No
			Investigation of Seasonal Facilities	State	Not Applicable	No
4) Focus on Collection of Late or Missing DMRs.	Eliminate SNC Violations for Missing Reports.	Formal and informal enforcement actions	Review compliance through staff and ICIS reports	State	Not Applicable	No
5) Track and Manage Non-SNC Violations and AO Compliance Schedules	To achieve a high rate of compliance with Agreed compliance schedules, and with Operation and Maintenance Requirements and effluent limits (pH, DO & E.Coli)	Facilities under Agreed Orders, Facilities with non-SNC violations	Provide state guidance to inspectors for selecting FY '11 inspection commitments	State	Not Applicable	Yes
			Formal (assessment of stipulated penalties) and informal enforcement actions are taken	State	Not Applicable	Yes
			EPA to assist in inspection of Majors and Industrial Pretreatment facilities as requested	Federal	State	Yes
			State monitors LTCP compliance implementation by State-lead CSO communities	State	Federal	No

6) SSO Elimination	Identify and address facilities with the worst compliance records	Required Overflow/Bypass Reporting to State	Conduct Routine Follow-Up on Reported Bypass-Overflows to Ensure Compliance with SSO AOs	State	Federal	Yes
		Medium-sized inventory (10-100 mgd) per EPA's national SSO initiative	Formal and informal enforcement actions including stipulated penalties for noncompliance			
			Conduct annual evaluations of communities not reporting SSOs and Collection-Only systems			
7) Update Permit Templates	Clarify permit requirements for State operational permits	Not applicable	Review and modify existing permits as warranted	State	Federal	No
			Utilize input from inspections conducted	State	Federal	No

8) Review Major Energy Permits	Thermal permits that are fully protective of aquatic life in receiving waterbodies	To be identified by IDEM	EPA will provide technical assistance on select 316 (a) and 316 (b) permits	Federal	State	Yes
			Review permits on major energy industries as requested by IDEM			
9) CAFOs	State rules and technical standards are updated to maintain consistency with EPA CAFO rule under the CWA.	N/A	Submit proposed rule changes for EPA review by November 2011	IDEM OLQ	Federal	Yes
	Compliance by CAFOs with permit requirements is regularly assessed	ICIS NPDES Compliance data	Permit all CAFO operations seeking permit coverage under the revised rules and regulations	IDEM OLQ	Federal	No
			Review ICIS/PCS databases and inspect of 20% of the CAFOs annually	IDEM OLQ	Federal	No
10) Industrial Pretreatment	Publicly Owned Treatment Works (POTWs) are protected from industrial non-compatible pollutants causing interference and/or pass-through problems	Industrial pretreatment program universe	Continued coordinated effort of issuance of permits with warranted Industrial pretreatment program requirements	State	Federal	Yes
			Monitoring of POTW industrial pretreatment programs as Approved, including monitoring of POTW DMRs and biosolids assays	State	Federal	Yes
			IDEM to instruct permittees to use EPA's model sewer use ordinance and local limit spreadsheet, as permits are issued/re-issued /reissued	State	Federal	Yes
			EPA to assist in inspection of Majors and Industrial Pretreatment facilities as requested, and pursue enforcement if appropriate.	Federal	State	Yes